

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

James Smith and Jerry Honse, on behalf of)	
themselves and all others similarly)	
situated, and on behalf of the Triad)	
Manufacturing, Inc. Employee Stock)	Civil Action No.: 1:20-cv-02350
Ownership Plans,)	
)	
Plaintiffs,)	JUDGE RONALD A. GUZMAN
)	
v.)	MAGISTRATE JUDGE YOUNG B. KIM
)	
)	
GreatBanc Trust Company, the Board of)	
Directors of Triad Manufacturing, Inc.,)	
David Caito, Robert Hardie, Michael)	
McCormick, Elizabeth J. McCormick,)	
Elizabeth J. McCormick Second)	
Amended and Restated Revocable)	
Living Trust, Michael K. McCormick)	
Second Amended and Restated)	
Revocable Living Trust, David M. Caito)	
Revocable Trust, and First Amended and)	
Restated Robert Hardie Revocable)	
Trust,)	
)	
Defendants.)	
)	

JOINT MOTION FOR EXTENSION OF
DEADLINES TO ALLOW FOR FURTHER SETTLEMENT NEGOTIATION

NOW COME the Plaintiffs James Smith and Jerry Honse (“Plaintiffs”), Defendant GreatBanc Trust Company (“GreatBanc”), and Defendants David Caito, Robert Hardie, and Michael McCormick, Elizabeth McCormick, and the Elizabeth J. McCormick Second Amended and Restated Revocable Living Trust, the Michael K. McCormick Second Amended and Restated Revocable Living Trust, the David M. Caito Revocable Trust, and the First Amended and Restated Robert Hardie Revocable Trust (collectively, the “Triad Defendants”), by and through their

respective undersigned counsel, to hereby request this Honorable Court extend the current deadlines set by the Court on October 20, 2022 (Dkt. No. 125) to allow the Parties additional time to reach a compromise resolution of this matter following their mediation on December 8, 2022, and in support thereof, state as follows:

1. On October 20, 2022, the Court granted the Parties' motion to modify that case schedule to allow the Parties to participate in a mediation and conserve costs for any potential settlement. The Court's order set the following schedule (Dkt. No. 125):

Event	Deadline
Mediation	December 8, 2022
Motion for Class Certification	December 20, 2022
Opposition to Class Certification	January 20, 2023
Class Certification Reply	February 10, 2023
Opening Expert Reports	March 1, 2023
Rebuttal Reports	March 31, 2023
Close of Expert Discovery	May 5, 2023

2. On December 8, 2022, the Parties participated in a full day, in-person mediation, which was facilitated by Michael D. Young, Esq. of JAMS ADR in New York, NY. The Parties did not resolve the matter during the December 8 mediation. However, the Parties continue to engage in good faith in settlement negotiation, aided by Mr. Young.
3. To allow the Parties to continue their efforts to negotiate a settlement and conserve costs for any potential settlement, the Parties hereby request that the above-referenced schedule be modified to allow additional time for the Parties to engage in negotiation.
4. This joint request is not made for the purpose of delay, but rather to allow the Parties to fully dedicate their efforts to attempt to resolve this matter following the December 8, 2022 mediation and accommodate the approaching holiday season.

WHEREFORE, the Parties respectfully request this Honorable Court modify the schedule entered on October 20, 2022 (Dkt. No. 125) as follows:

Event	Current Deadline	Proposed New Deadline
Motion for Class Certification	December 20, 2022	January 17, 2023
Opposition to Class Certification	January 20, 2023	February 17, 2023
Class Certification Reply	February 10, 2023	March 10, 2023
Opening Expert Reports	March 1, 2023	March 22, 2023
Rebuttal Reports	March 31, 2023	April 21, 2023
Close of Expert Discovery	May 5, 2023	May 26, 2023

Dated: December 13, 2022

Respectfully Submitted,

/s/ Mary J. Bortscheller

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